

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

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A.S.A.P. LOGISTICS, LTD.

Plaintiff,

- against -

~~UPS SUPPLY CHAIN SOLUTIONS, INC.~~

Defendant.  
-----X

Index No. 714336/2020  
Date Purchased: August 27, 2020

**SUMMONS**

Plaintiff's Address:  
148-05 175<sup>th</sup> Street  
Jamaica, NY 11434

Venue is based on location of plaintiff's  
office and principal place of business

To the above-named Defendant:

YOU ARE HEREBY SUMMONED to answer the verified complaint in this action and to serve a copy of your answer on the plaintiff's attorney within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York; and in case of your failure to appear or answer, Judgment will be taken by default for the relief demanded herein.

Dated: Brooklyn, New York  
August 27, 2020

LAW OFFICE OF DANIEL FRIEDMAN

By: *Daniel Friedman*  
Daniel Friedman, Esq.  
*Attorneys for Plaintiff*  
5417 18<sup>th</sup> Avenue, Suite 102  
Brooklyn, New York 11204  
(917) 406-8568

Defendant's Address:

UPS SUPPLY CHAIN SOLUTIONS, INC.  
c/o Corporation Service Company  
80 State Street  
Albany, New York 12207-2543

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X

A.S.A.P. LOGISTICS, LTD.,

Index No. 714336/2020

Plaintiff,

**VERIFIED COMPLAINT**

- against -

UPS SUPPLY CHAIN SOLUTIONS, INC.,

Defendant.

-----X

Plaintiff, A.S.A.P. LOGISTICS, LTD., by its attorneys, LAW OFFICE OF DANIEL FRIEDMAN, complaining of defendant, UPS SUPPLY CHAIN SOLUTIONS, INC., alleges as follows:

1. Plaintiff, A.S.A.P. LOGISTICS, LTD., is a Delaware corporation, which is duly authorized to conduct business in the State of New York, and which maintains its principal office and place of business at 148-05 175th Street, Jamaica, NY 11434, in the State and City of New York, County of Queens.

2. Upon information and belief, defendant UPS SUPPLY CHAIN SOLUTIONS, INC., is also a Delaware corporation, which is duly authorized to conduct business in the State of New York.

3. The causes of action alleged herein arose in the State and City of New York, County of Queens.

4. This is an action to recover \$3.2 million in damages sustained by plaintiff by reason of defendant's intentional failure and refusal to timely ship goods, consisting of some 2.3 million

masks, that were on order from a substantial customer, as a result of which the orders were cancelled.

5. Defendant knowingly kept bumping plaintiff's freight off the airline and putting someone else's freight ahead.

6. In addition, defendant engaged in price gouging.

WHEREFORE, plaintiff, A.S.A.P. LOGISTICS, LTD., respectfully seeks: (a) a money Judgment in favor of plaintiff, A.S.A.P. LOGISTICS, LTD., and against defendant, UPS SUPPLY CHAIN SOLUTIONS, INC., in the sum of \$3.2 million; (b) a determination of additional monies due from defendant by reason of its price gouging; and (c) such other and further relief as the Court may deem just and proper.

Dated: Brooklyn, New York  
August 27, 2020

LAW OFFICE OF DANIEL FRIEDMAN

By: *Daniel Friedman*  
Daniel Friedman, Esq.  
*Attorneys for Plaintiff, A.S.A.P. LOGISTICS, LTD.*  
5417 18<sup>th</sup> Avenue, Suite 102  
Brooklyn, New York 11204  
(917) 406-8568  
[dfriedmanlegal@gmail.com](mailto:dfriedmanlegal@gmail.com)

**VERIFICATION**

STATE OF NEW YORK:

SS:

COUNTY OF KINGS:

Daniel Friedman, Esq., an attorney duly admitted to practice before the Courts of the State of New York, affirms under penalty of perjury: I represent plaintiff in the within action. I have read the foregoing Verified Complaint and know the contents thereof. The same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true. This verification is made by me as the plaintiffs reside in a different County from the County where my office is maintained.

Date: Brooklyn, New York  
August 27, 2020

*Daniel Friedman*  
DANIEL FRIEDMAN, ESQ.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X

A.S.A.P. LOGISTICS, LTD.,

Index No. 714336/2020

Plaintiff,

- against -

UPS SUPPLY CHAIN SOLUTIONS, INC., ANDREW  
STAFFORD, and TIAA-CREF INDIVIDUAL  
& INSTITUTIONAL SERVICES, LLC,

Defendants.

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**SUMMONS AND VERIFIED COMPLAINT**

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**LAW OFFICE OF DANIEL FRIEDMAN**  
*Attorneys for Plaintiff, A.S.A.P. LOGISTICS, LTD.*  
5417 18<sup>th</sup> Avenue, Suite 102  
Brooklyn, New York 11204  
(917) 406-8568

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF

-----X  
A.S.A.P. LOGISTICS, LTD.

Plaintiff/Petitioner,

- against -

UPS SUPPLY CHAIN SOLUTIONS, INC.,

Index No. 714336/2020

Defendant/Respondent.  
-----X

**NOTICE OF ELECTRONIC FILING**  
**(Consensual Case)**  
(Uniform Rule § 202.5-b)

**You have received this Notice because:**

1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and

2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

**You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.**

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: [www.nycourts.gov/efile-unrepresented](http://www.nycourts.gov/efile-unrepresented) or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)

To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

### Information for Attorneys

An attorney representing a party who is served with this notice must either consent or decline consent to electronic filing and service through NYSCEF for this case.

Attorneys registered with NYSCEF may record their consent electronically in the manner provided at the NYSCEF site. Attorneys not registered with NYSCEF but intending to participate in e-filing must first create a NYSCEF account and obtain a user ID and password prior to recording their consent by going to [www.nycourts.gov/efile](http://www.nycourts.gov/efile)

Attorneys declining to consent must file with the court and serve on all parties of record a declination of consent.

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov)).

Dated: August 28, 2020

Daniel Friedman, Esq.

Name

Law Office of Daniel Friedman

Firm Name

5417 18th Avenue, Suite 102

Brooklyn, New York 11204

Address

917-406-8568

Phone

dfriedmanlegal@gmail.com

E-Mail

To: UPS Supply Chain Solutions, Inc

c/o Corporation Service Co.

80 State St., Albany NY 11207

2/24/20